



200 WEST 41<sup>ST</sup> STREET  
17<sup>TH</sup> FLOOR  
NEW YORK, NY 10036-7203  
TELEPHONE (212) 972-3000  
TELEFAX (212) 972-2245  
WWW.KLESTADT.COM

February 3, 2023

**Via Electronic Mail ([Anthony.TseKM@UOBGroup.com](mailto:Anthony.TseKM@UOBGroup.com))**

United Overseas Bank Limited, Hong Kong Branch  
23/F, 3 Garden Road  
Central, Hong Kong  
Attn: Tung Hing Yin George

**Re: China Fishery Group Limited *et al.***  
**Case No. 16 – 11895 (JLG)**

Dear Mr. Tung:

Our firm is counsel to the Debtors, including Pacific Andes Resources Development Limited (“**PARD**”), in the above captioned bankruptcy cases. Demand is hereby made for the turnover of certain funds held in accounts in the name of or held on account for PARD by United Overseas Bank Limited, Hong Kong Branch (“**UOB**”).

On February 23, 2022, the United States Bankruptcy Court for the Southern District of New York (the “**Court**”)<sup>1</sup> entered an *Order Confirming Seventh Amended Joint Chapter 11 Plan of Reorganization of China Fishery Group Limited (Cayman), Pacific Andes Resources Development Limited (Bermuda) and Certain of Their Affiliated Debtors* (“**CFGL-PARD Confirmation Order**”). Notice of the Effective Date of the Joint Debtor Plan was filed on December 23, 2022. Pursuant to the terms of the Joint Debtor Plan, any Claim arising from the UOB Banking Facility, as defined in the Joint Debtor Plan, was classified under the PARD Class 9 claims. The Joint Debtor Plan provided for the treatment of all PARD Class 9 Claims, including all distributions related thereto.

On or about May 11, 2017, UOB filed its Proof of Claim, Claim No. 32-1 (“**UOB Claim**”), whereby UOB asserted a general unsecured claim as against PARD under the UOB Banking Facility. As set forth in the UOB Claim, UOB acknowledged that it holds certain funds in accounts in the name of or held on account for PARD. Specifically, the UOB Claim acknowledges that, as of May 11, 2017, UOB held cash balances in PARD’s accounts in the sums of USD369,441.03 and Euro 20,141.49 (the “**Deposit Account Proceeds**”). The Deposit Account Proceeds are property of PARD’s bankruptcy estate. Demand is hereby made for turnover and refund of the

---

<sup>1</sup>Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Seventh Amended Joint Chapter 11 Plan of Reorganization of China Fishery Group Limited (Cayman), Pacific Andes Resources Development Limited (Bermuda) and Certain of Their Affiliated Debtors (the “**Joint Debtor Plan**”) [ECF No. 2978-1].

Deposit Account Proceeds in full. UOB is instructed to forward the funds to our attorneys' escrow account pursuant to the attached wire instructions. The refusal to turnover property of the estate is and remains a violation of the United States Bankruptcy Code.

To the extent the Deposit Account Proceeds are not received within five (5) business days, PARD shall take all actions necessary to protect the interests of its estate, including withholding any payments which may be due and owing to UOB as a result of the UOB Claim or UOB Banking Facility under the Debtors' Joint Debtor Plan.

If you have any questions, please do not hesitate to contact me.

Thank you for your anticipated cooperation.

Respectfully submitted,

*/s/John E. Jureller, Jr.*

John E. Jureller, Jr.

Encl.